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*Attorneys for Defendants The Estate of Robert Shervyn Savin
and Barbara L. Savin, in her capacity as Personal Representative
of the Estate of Robert Shervyn Savin*

**UNITED STATES BANKRUPTCY COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

THE ESTATE OF ROBERT SHERVYN SAVIN,
and BARBARA L. SAVIN, in her capacity as
Personal Representative of the Estate of Robert
Shervyn Savin,

Defendants.

Adv. Pro No. 10-04889 (SMB)

**DECLARATION OF HELEN DAVIS CHAITMAN IN SUPPORT OF MOTION
FOR MANDATORY WITHDRAWAL OF THE REFERENCE AND TO DISMISS FOR
LACK OF SUBJECT-MATTER JURISDICTION**

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C. §1746, as follows:

1. I am a member of Chaitman LLP, counsel to defendants, the Estate of Robert Shervyn Savin, and Barbara L. Savin, in her capacity as Personal Representative of the Estate of Robert Shervyn Savin (“Defendants”). I am a member of the bars of New York and New Jersey, and I am admitted to practice in this Court.

2. I submit this declaration in support of Defendants’ motion for mandatory withdrawal of the reference and to dismiss for lack of subject-matter jurisdiction.

3. Attached hereto as **Exhibit A** is a true and accurate copy of relevant pages from the Trial Transcript dated May 9, 2019 in *Picard v. Carol & Stanley Nelson*, (“*Nelson*”), Adv. Pro. Nos. 10-04377 and 10-04658.

4. Attached hereto as **Exhibit B** is a true and accurate copy of the July 17, 1991 letterhead of Bernard L. Madoff Investment Securities, and bates stamped MADTSS01301365-71.

5. Attached hereto as **Exhibit C** is a true and accurate copy of a document dated February 9, 1979 confirming a credit to the Unflats, who were Madoff customers, from “Bernard L. Madoff Investment Securities”, and bates stamped 10-5420_Defendant_0002412.

6. Attached hereto as **Exhibit D** is a true and accurate copy of a confirmation slip dated February 7, 1979 to the Unflats, who were Madoff customers, from “Bernard L. Madoff Investment Securities”, and bates stamped 10-05420_Defendant_0002413.

7. Attached hereto as **Exhibit E** is a true and accurate copy of the January 1, 2001 letter from Madoff and the LLC to the Bank of New York, and bates stamped MESTABL00005744.

8. Attached hereto as **Exhibit F** is a true and accurate copy of the January 1, 2001 letter from Madoff and the LLC to the National Securities Clearing Corporation, and bates stamped MADTEE00544438.

9. Attached hereto as **Exhibit G** is a true and accurate copy of the January 1, 2001 letter from Madoff and the LLC to the Options Clearing Corporation, and bates stamped MADTEE00544725.

10. Attached hereto as **Exhibit H** is a true and accurate copy of the January 1, 2001 letter from Madoff and the LLC to the Depository Trust Company, and bates stamped MESTABL00005745.

11. Attached hereto as **Exhibit I** is a true and accurate copy of the Securities Exchange Commission Form BD.

12. Attached hereto as **Exhibit J** is a true and accurate copy of the relevant pages of an account statement for the 703 Account dated March 2000 reflecting a deposit in the amount of \$800,000 on March 6, 2000 referencing “Robert S. Savin”, and bates stamped MADWAA01072725.

13. Attached hereto as **Exhibit K** is a true and accurate copy of the relevant pages of an account statement dated January 2001 for the 703 Account reflecting a deposit in the amount of \$700,000 on January 18, 2001 referencing “First Security Bank Natl Assoc”, and bates stamped MADWAA00147962.

14. Attached hereto as **Exhibit L** is a true and accurate copy of written correspondence from Robert S. Savin to Bernard L. Madoff dated January 19, 2001 noting that a deposit in the amount of \$700,000 was made by wire transfer from “First American Security” into Robert S. Savin’s Madoff account referencing “ISO412-3-0”, and bates stamped MADTSS01115837-38.

15. Attached hereto as **Exhibit M** is a true and accurate copy of an account statement dated December 2002 for the 703 Account reflecting a deposit in the amount of \$58,461.51 on December 23, 2002 referencing “Robert S. Savin”, and bates stamped JPMSAB0000191.

16. Attached hereto as **Exhibit N** is a true and accurate copy of a check dated May 10, 2004 in the amount of \$75,000 paid to the order of Bernard L. Madoff drawn by Robert S. Savin and endorsed by Bernard L. Madoff into the 703 Account, and bates stamped JPMSAI0005648.

17. Attached hereto as **Exhibit O** is a true and accurate copy of a disbursement check dated April 16, 2001 in the amount of \$75,000 paid to Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped MADWAA00132643-44.

18. Attached hereto as **Exhibit P** is a true and accurate copy of a disbursement check dated September 5, 2001 in the amount of \$60,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped MADWAA00100060-61.

19. Attached hereto as **Exhibit Q** is a true and accurate copy of a disbursement check dated December 18, 2001 in the amount of \$60,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0000419.

20. Attached hereto as **Exhibit R** is a true and accurate copy of a disbursement check dated February 5, 2002 in the amount of \$35,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0002081-82.

21. Attached hereto as **Exhibit S** is a true and accurate copy of a disbursement check dated April 2, 2002 in the amount of \$50,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0003288.

22. Attached hereto as **Exhibit T** is a true and accurate copy of a disbursement check dated April 16, 2002 in the amount of \$140,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0004102.

23. Attached hereto as **Exhibit U** is a true and accurate copy of a disbursement check dated May 1, 2002 in the amount of \$30,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0004323.

24. Attached hereto as **Exhibit V** is a true and accurate copy of a disbursement check dated June 5, 2002 in the amount of \$100,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0004889.

25. Attached hereto as **Exhibit W** is a true and accurate copy of a disbursement check dated August 27, 2002 in the amount of \$50,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0007026.

26. Attached hereto as **Exhibit X** is a true and accurate copy of a disbursement check dated December 11, 2002 in the amount of \$27,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0009861.

27. Attached hereto as **Exhibit Y** is a true and accurate copy of a disbursement check dated January 8, 2003 in the amount of \$35,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0011025.

28. Attached hereto as **Exhibit Z** is a true and accurate copy of a disbursement check dated January 15, 2003 in the amount of \$27,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0011687.

29. Attached hereto as **Exhibit AA** is a true and accurate copy of a disbursement check dated March 10, 2003 in the amount of \$30,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0012402.

30. Attached hereto as **Exhibit AB** is a true and accurate copy of a disbursement check dated April 10, 2003 in the amount of \$25,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0013890.

31. Attached hereto as **Exhibit AC** is a true and accurate copy of a disbursement check dated May 1, 2003 in the amount of \$25,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0014197.

32. Attached hereto as **Exhibit AD** is a true and accurate copy of a disbursement check dated June 12, 2003 in the amount of \$25,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0014865-66.

33. Attached hereto as **Exhibit AE** is a true and accurate copy of a disbursement check dated June 12, 2003 in the amount of \$160,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0014867.

34. Attached hereto as **Exhibit AF** is a true and accurate copy of a disbursement check dated August 14, 2003 in the amount of \$10,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0016611.

35. Attached hereto as **Exhibit AG** is a true and accurate copy of a disbursement check dated August 20, 2003 in the amount of \$10,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0016690.

36. Attached hereto as **Exhibit AH** is a true and accurate copy of a disbursement check dated August 29, 2003 in the amount of \$10,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0016826.

37. Attached hereto as **Exhibit AI** is a true and accurate copy of a disbursement check dated September 10, 2003 in the amount of \$12,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0017042.

38. Attached hereto as **Exhibit AJ** is a true and accurate copy of a disbursement check dated September 12, 2003 in the amount of \$30,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0017106.

39. Attached hereto as **Exhibit AK** is a true and accurate copy of a disbursement check dated January 7, 2004 in the amount of \$19,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0019956.

40. Attached hereto as **Exhibit AL** is a true and accurate copy of a disbursement check dated January 15, 2004 in the amount of \$11,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0020620.

41. Attached hereto as **Exhibit AM** is a true and accurate copy of a disbursement check dated January 16, 2004 in the amount of \$25,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF000642.

42. Attached hereto as **Exhibit AN** is a true and accurate copy of a disbursement check dated March 11, 2004 in the amount of \$16,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0021540.

43. Attached hereto as **Exhibit AO** is a true and accurate copy of a disbursement check dated March 30, 2004 in the amount of \$25,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0021869.

44. Attached hereto as **Exhibit AP** is a true and accurate copy of a disbursement check dated April 19, 2004 in the amount of \$20,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0023300.

45. Attached hereto as **Exhibit AQ** is a true and accurate copy of a disbursement check dated May 26, 2004 in the amount of \$35,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0023845.

46. Attached hereto as **Exhibit AR** is a true and accurate copy of a disbursement check dated June 25, 2004 in the amount of \$15,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0024378.

47. Attached hereto as **Exhibit AS** is a true and accurate copy of a disbursement check dated July 9, 2004 in the amount of \$5,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0025927.

48. Attached hereto as **Exhibit AT** is a true and accurate copy of a disbursement check dated August 9, 2004 in the amount of \$10,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0026396.

49. Attached hereto as **Exhibit AU** is a true and accurate copy of a disbursement check dated September 8, 2004 in the amount of \$35,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0026889.

50. Attached hereto as **Exhibit AV** is a true and accurate copy of a disbursement check dated September 16, 2004 in the amount of \$19,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0027080.

51. Attached hereto as **Exhibit AW** is a true and accurate copy of a disbursement check dated December 7, 2004 in the amount of \$10,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0029397.

52. Attached hereto as **Exhibit AX** is a true and accurate copy of a disbursement check dated January 7, 2005 in the amount of \$30,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0031323.

53. Attached hereto as **Exhibit AY** is a true and accurate copy of a disbursement check dated January 12, 2005 in the amount of \$20,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0031397.

54. Attached hereto as **Exhibit AZ** is a true and accurate copy of a disbursement check dated March 10, 2005 in the amount of \$5,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0032334.

55. Attached hereto as **Exhibit BA** is a true and accurate copy of a disbursement check dated April 6, 2005 in the amount of \$41,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0033934.

56. Attached hereto as **Exhibit BB** is a true and accurate copy of a disbursement check dated April 12, 2005 in the amount of \$7,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0034138.

57. Attached hereto as **Exhibit BC** is a true and accurate copy of a disbursement check dated June 8, 2005 in the amount of \$25,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0035192.

58. Attached hereto as **Exhibit BD** is a true and accurate copy of a disbursement check dated June 30, 2005 in the amount of \$30,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0035589.

59. Attached hereto as **Exhibit BE** is a true and accurate copy of a disbursement check dated September 7, 2005 in the amount of \$10,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0037750.

60. Attached hereto as **Exhibit BF** is a true and accurate copy of a disbursement check dated October 13, 2005 in the amount of \$20,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0039477.

61. Attached hereto as **Exhibit BG** is a true and accurate copy of a disbursement check dated December 16, 2005 in the amount of \$40,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0040715.

62. Attached hereto as **Exhibit BH** is a true and accurate copy of a disbursement check dated December 22, 2005 in the amount of \$20,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0040883.

63. Attached hereto as **Exhibit BI** is a true and accurate copy of a disbursement check dated February 3, 2006 in the amount of \$15,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0042896.

64. Attached hereto as **Exhibit BJ** is a true and accurate copy of a disbursement check dated March 9, 2006 in the amount of \$5,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0043476.

65. Attached hereto as **Exhibit BK** is a true and accurate copy of a disbursement check dated March 24, 2006 in the amount of \$5,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0043712.

66. Attached hereto as **Exhibit BL** is a true and accurate copy of a disbursement check dated April 4, 2006 in the amount of \$10,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0044624.

67. Attached hereto as **Exhibit BM** is a true and accurate copy of a disbursement check dated April 7, 2006 in the amount of \$25,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0045215.

68. Attached hereto as **Exhibit BN** is a true and accurate copy of a disbursement check dated June 5, 2006 in the amount of \$20,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0046457.

69. Attached hereto as **Exhibit BO** is a true and accurate copy of a disbursement check dated June 21, 2006 in the amount of \$10,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0046770.

70. Attached hereto as **Exhibit BP** is a true and accurate copy of a disbursement check dated July 18, 2006 in the amount of \$7,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0048103.

71. Attached hereto as **Exhibit BQ** is a true and accurate copy of a disbursement check dated August 30, 2006 in the amount of \$20,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0048684.

72. Attached hereto as **Exhibit BR** is a true and accurate copy of a disbursement check dated September 15, 2006 in the amount of \$5,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0049028.

73. Attached hereto as **Exhibit BS** is a true and accurate copy of a disbursement check dated October 25, 2006 in the amount of \$35,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0050604.

74. Attached hereto as **Exhibit BT** is a true and accurate copy of a disbursement check dated November 17, 2006 in the amount of \$10,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0051077.

75. Attached hereto as **Exhibit BU** is a true and accurate copy of a disbursement check dated December 14, 2006 in the amount of \$15,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0051923.

76. Attached hereto as **Exhibit BV** is a true and accurate copy of a disbursement check dated December 21, 2006 in the amount of \$25,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0052254.

77. Attached hereto as **Exhibit BW** is a true and accurate copy of a disbursement check dated January 25, 2007 in the amount of \$25,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0053693.

78. Attached hereto as **Exhibit BX** is a true and accurate copy of a disbursement check dated February 6, 2007 in the amount of \$15,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0053884.

79. Attached hereto as **Exhibit BY** is a true and accurate copy of a disbursement check dated March 14, 2007 in the amount of \$25,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0054402.

80. Attached hereto as **Exhibit BZ** is a true and accurate copy of a disbursement check dated March 26, 2007 in the amount of \$10,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0054589.

81. Attached hereto as **Exhibit CA** is a true and accurate copy of a disbursement check dated May 23, 2007 in the amount of \$30,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0056798.

82. Attached hereto as **Exhibit CB** is a true and accurate copy of a disbursement check dated June 7, 2007 in the amount of \$20,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0057164.

83. Attached hereto as **Exhibit CC** is a true and accurate copy of a disbursement check dated July 10, 2007 in the amount of \$10,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0058680.

84. Attached hereto as **Exhibit CD** is a true and accurate copy of a disbursement check dated August 6, 2007 in the amount of \$2,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0059154.

85. Attached hereto as **Exhibit CE** is a true and accurate copy of a disbursement check dated August 10, 2007 in the amount of \$12,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0059223.

86. Attached hereto as **Exhibit CF** is a true and accurate copy of a disbursement check dated August 21, 2007 in the amount of \$4,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0059360.

87. Attached hereto as **Exhibit CG** is a true and accurate copy of a disbursement check dated August 28, 2007 in the amount of \$15,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0059464.

88. Attached hereto as **Exhibit CH** is a true and accurate copy of a disbursement check dated October 2, 2007 in the amount of \$10,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0060713.

89. Attached hereto as **Exhibit CI** is a true and accurate copy of a disbursement check dated November 9, 2007 in the amount of \$10,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0061809.

90. Attached hereto as **Exhibit CJ** is a true and accurate copy of a disbursement check dated November 20, 2007 in the amount of \$5,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0061960.

91. Attached hereto as **Exhibit CK** is a true and accurate copy of a disbursement check dated December 11, 2007 in the amount of \$15,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0062437.

92. Attached hereto as **Exhibit CL** is a true and accurate copy of a disbursement check dated January 2, 2008 in the amount of \$25,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0063460.

93. Attached hereto as **Exhibit CM** is a true and accurate copy of a disbursement check dated January 14, 2008 in the amount of \$12,500 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0064252.

94. Attached hereto as **Exhibit CN** is a true and accurate copy of a disbursement check dated February 25, 2008 in the amount of \$20,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0064882.

95. Attached hereto as **Exhibit CO** is a true and accurate copy of a disbursement check dated March 25, 2008 in the amount of \$20,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0065353.

96. Attached hereto as **Exhibit CP** is a true and accurate copy of a disbursement check dated April 14, 2008 in the amount of \$25,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0066810.

97. Attached hereto as **Exhibit CQ** is a true and accurate copy of a disbursement check dated May 9, 2008 in the amount of \$15,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0067262.

98. Attached hereto as **Exhibit CR** is a true and accurate copy of a disbursement check dated June 6, 2008 in the amount of \$25,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0067856.

99. Attached hereto as **Exhibit CS** is a true and accurate copy of a disbursement check dated June 30, 2008 in the amount of \$30,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0068669.

100. Attached hereto as **Exhibit CT** is a true and accurate copy of a disbursement check dated July 23, 2008 in the amount of \$10,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0069519.

101. Attached hereto as **Exhibit CU** is a true and accurate copy of a disbursement check dated November 24, 2008 in the amount of \$20,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0072525.

102. Attached hereto as **Exhibit CV** is a true and accurate copy of a disbursement check dated December 10, 2008 in the amount of \$20,000 paid to the order of Robert S. Savin drawn by Bernard L. Madoff from the 509 Account, and bates stamped JPMSAF0072926.

103. Attached hereto as **Exhibit CW** is a true and accurate copy of statements for account #xxxxxx1703 (the “703 Account”) held by Bernard L. Madoff with JP Morgan Chase Bank, N.A., and bates stamped beginning MADWAA00139882.

104. Attached hereto as **Exhibit CX** is true and accurate copy of statements from the controlled disbursement account #xxxxxxxxx1509 (the “509 Account”) held by Bernard L. Madoff with JP Morgan Chase Bank, N.A., and bates stamped beginning JPMTAA0000316.

105. Attached hereto as **Exhibit CY** is a true and accurate copy of the JP Morgan Chase 509 Account Global Electronic Funding Reports, and bates stamped beginning MADTSS01284251.

106. Attached hereto as **Exhibit CZ** is a true and accurate copy of relevant pages from the Trial Transcript dated May 8, 2019 in *Picard v. Carol & Stanley Nelson*, (“*Nelson*”), Adv. Pro. Nos. 10-04377 and 10-04658.

107. Attached hereto as **Exhibit DA** is a true and accurate copy of email dated June 12, 2018 from Maximillian S. Shifrin, Esq. to Helen Davis Chaitman, Esq.

108. Attached hereto as **Exhibit DB** is a true and accurate copy of correspondence from Robert S. Savin to “Bernard L. Madoff”, “Bernard Madoff”, “Bernard Madoff Withdrawal Dept”, “Sir or Mrs” and “Bernard L. Madoff Investment Securities” et al., from the customer file, and bates stamped MADTSS01115741-839.

109. Attached hereto as **Exhibit DC** is a true and accurate copy of the relevant account agreements associated with Robert S. Savin’s account No. 1SO412 dated November 8, 2004: a Customer Questionnaire and Certification, a Customer Agreement, an Option Agreement and a Trading Authorization to Purchases and Sales of Securities and Options, and bates stamped MADTSS00548597-603.

110. Attached hereto as **Exhibit DD** is a true and accurate copy of the relevant account agreements associated with Robert S. Savin’s account No. 1SO412 dated January 17, 2000: a Customer Agreement, an Option Agreement and a Trading Authorization to Purchases and Sales of Securities and Options, and bates stamped MADTSS01115840-47.

111. Attached hereto as **Exhibit DE** is a true and accurate copy of the Complaint, *Picard v. Savin*, Adv. Pro. No. 10-04889, ECF Doc. No. 1.

112. Attached hereto as **Exhibit DF** is a true and accurate copy of the Answer, *Picard v. Savin*, Adv. Pro. No. 10-04889, ECF Doc. No. 40.

Dated: New York, New York
February 3, 2020

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
Helen Davis Chaitman